

## Chapin, Douglas H

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**From:** Richard I. Smith [ri\_smith@owt.com]  
**Sent:** Friday, August 20, 2004 3:04 PM  
**To:** Douglas\_H\_Chapin@rl.gov  
**Subject:** Scoping of EIS for Decommissioning FFTF

Having read the NOI, I suggest that one clearly viable alternative has been omitted from consideration. An Interim Safe Storage alternative should also be considered for FFTF. This alternative would be similar to the Interim Safe Storage alternatives being carried out for the retired production reactors at Hanford, i.e., after being placed into a permanent safe shutdown condition, the auxiliary support structures outside of the reactor containment building would be decontaminated and demolished, loose contaminated material within the containment structure would be removed, and the containment structure would be secured for Interim Safe Storage. Internal inspections of the secured structure would be carried out at specified intervals (every 5 or 10 years), with security of the whole site carried out as is the case for the secured retired production reactors. This alternative has the benefits of postponing work on dismantlement of the containment structure internals until the shorter-lived radioactive activation products and fission products have decayed to very low activity levels, thus greatly diminishing the probable radiation exposure to workers involved in the dismantlement activities. It would also have the advantage of not irretrievably committing the site to being a radioactive waste burial site at this time, allowing a final decision to be made on the ultimate disposition of the containment structure at a future time.

Richard I Smith, P.E.



**Chapin, Douglas H**

**From:** Beach, Robert R (Bob)  
**Sent:** Wednesday, August 25, 2004 8:12 AM  
**To:** Chapin, Douglas H; York, Michael T  
**Subject:** Content of Sodium Residuals Processing for EIS

If this group is still in contention for the FFTF Closure Contract, the EIS should consider the ammonia based reaction process as one alternative.

Robert R. Beach

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**From:** Kris and GaryTroyer [mailto:kgtroyer@charter.net]  
**Sent:** Tuesday, August 24, 2004 06:39 PM  
**To:** KDDNEP@aol.com  
**Cc:** robert.schenter@pnl.gov; Douglas\_H\_Chapin@rl.gov; carmel@3-cities.com; echarvet@3-cities.com; ellahhf@gte.net; dnoski@bf-wdc.org; ClaudeOliver@aol.com; ray@rkri.com; reschenter@charter.net; mm-cybernuke@charter.net; johnboland@earthlink.net; acary@tri-cityherald.com; garryb@tricity.wsu.edu; foxy1@owt.com; mansperg@3-cities.com; WIMUNN@aol.com; bmoliver@televar.com; jimtoth73@owt.com; garlandmarc@earthlink.net; jvdelisle@verizon.net; toocoolraul@yahoo.com; mr.rb@worldnet.com; budzeck@portalofbenton.com; shannoncartier@clearchannel.com; mike@4-homes.com; jimnliz@quinix.net; cdarley@owt.com; jdeichman@msn.com; Fromthetrenches@aol.com; measure.up@charter.net; ShirleywHank@aol.com; zachary.hontz@pnl.gov; skelly@owt.com; camillekeyes@hotmail.com; kirx@msm.com; lluginbi@tricity.wsu.edu; joyce.olson@mailhouse.gov; tott@keprtv.com; jaderedinger@yahoo.com; StokesWJ@aol.com; djswanberg@msm.com; waltar@charter.net; holdercarl@hotmail.com; drjohn3641@earthlink.net; hla8@juno.com; ks\_armstrong@hotmail.com; Shannon@columbiariverjourneys.com; Ron@RainierSvcs.com; erastley@charter.net; jjdda@earthlink.net; deanna\_baalman@rsd.edu; GBaasch@CI.RICHLAND.WA.US; Harry.Babad@pnl.gov; Chiggitychad@aol.com; barb\_wagner@co.benton.wa.us; "ontheegreen@charter.netontheegreen"@charter.net; bassmb@yahoo.com; Robert\_R\_Bob\_Beach@rl.gov; brad@connelloil.com; Bennett@Port-of-Benton.com; mbensky@email.msn.com; Lbertsch@UnitedWay-bfco.com; ABG5219@aol.com; glenn@rpsincgc.com; bhawkins@esd123.org; bryson@bsolid.com; ksblume@msn.com; bobbie\_gagner@co.benton.wa.us; tbouchey@cbadams.com; doug\_bragg@rl.gov; LaBray@cbvcp.com; billb727@charter.net; HBA@3-cities.com; mr.rb@worldnet.att.net; pshults@co.franklin.wa.us; ronandjo@televar.com; Robert\_D\_Bromm@rl.gov; PBrown@CI.RICHLAND.WA.US; budzeck@portofbenton.com; buelri@ksd.org; JCiha5101@aol.com; pclouse@3-cities.com; rscoler@bossig.com; alpha@3rdwave.com; dennis\_Cox@BC.com; crstrode@webbworks.com; b.cullinane@att.net; t.cupples@charter.net; jimnliz@quixnet.net; dkcd@owt.com; dezoom@msn.com; duane\_davidson@co.benton.wa.us; Deborah\_y\_Smith@keybank.com; tdenchel@hotmail.com; ddrfrms@eltopia.com; brett.didier@pnl.gov; JimDillman@Dillman-Luvaas.com; Kenneth\_D\_Dobbin@rl.gov; desert@bossig.com; Jdomski@aol.com; DONPRATT@aol.com; Sonlander@aol.com  
**Subject:** Re: 199 words for claudie and leo

-->Ken - I think your letter is right on target. I think the Tri-City Herald is beginning to have trouble with some of their endorsements and is choosing to manage the news and pre-judge the needs of their subscribers in order to placate a few high rollers. Just because the comment is so close to home should not be a reason to censor. Big money against honesty? You bet. Check out the press release of April of 2002 in which Commodore Applied Technologies "Announces Joint Venture With Nuvotec...." ( [http://www.commodore.com/news/news\\_releases.htm#4\\_10\\_02\\_Commodore%20Applied%20Technologies](http://www.commodore.com/news/news_releases.htm#4_10_02_Commodore%20Applied%20Technologies): ) At that time, the local principal was a prime lobbyist for TriDec. Conflict of interest? Don't allow anyone to use the FFTF because someone is on the inside track? Is someone being put up as a parrot to such influences? Hmmmmmm?

And then there was the follow-on press release in the middle of DOE encouraged private re-utilization bid workup on the FFTF in April of this year:

"Chairman and CEO Shelby Brewer stated that the Company has entered into a "preferred subcontractor" relationship with FFTF Restoration, LLC (FRC), one of several bidders to the Department of Energy's request for proposals to assist it in closing the Fast Flux Test Facility at the Hanford site. As one of the FRC subcontractors, Commodore is offering its SET process for sodium removal and conversion. The FRC bid has been submitted, oral

10/13/2004

presentations have been made, and the DOE is expected to award the contract in mid-summer 2004." ( [http://www.commodore.com/news/news\\_releases.htm#April15\\_2004](http://www.commodore.com/news/news_releases.htm#April15_2004) ) (who the heck is FFTF Restoration, LLC?)

Because of some integrity and honesty driven by two county commissioners and others, the DOE must first do an EIS before they can let this contract!

So who's trying to build our community and who was and is trying to tear it down? Who was and is associated with this "scenario"?

Anyone ever hear of the phrase "follow the money"?

Gary

At 05:39 PM 8/24/2004, KDDNEP@aol.com wrote:

Good afternoon everyone,

I hope you have better luck than I at getting a letter to the editor printed at the Herald. I submitted the following letter 12 days ago and inquired today as to its status. The editor of the editorial page told me that they are still evaluating my letter because what I write is not "what their readers want to see in the paper." (I've been in elected office 10 years and my experience tells me she is saying that it will not be printed.) I asked her to consider printing it because I do believe people would like to hear my opinion.

Please read my letter and see if you agree with me or the Herald.

Thanks,

Ken Dobbin

To the Editor:

Citizens frequently ask me why elected officials don't stand up for what is right. Experience tells those elected that if they do and step on the toes of big money, they encounter heavily-financed opponents at the next election. Too often great leaders are voted out because the truth cannot overcome money.

Benton County Commissioner Claude Oliver stood up for us when other elected officials quit. He obtained \$47 million from federal payment in lieu of taxes that Washington DC was going to steal from us Benton County residents. Claude championed the cause of medical science when others said it was too difficult and a lost cause. The results are better justice and a much better understanding of current and future treatment available for Americans dying of cancer and other difficult-to-treat diseases.

Now it is up to us to show elected officials everywhere that we will vote for those who do the right thing. This primary election, you must choose a Republican ballot to be able to vote for Claude. Let's create a land-slide victory for Claude Oliver, Benton County Commissioner District 3, either by absentee ballot or at the polls September 14. It's that important!

10/13/2004

Ken Dobbin  
West Richland  
376-9415  
521-6186

8/12/2004

10/13/2004



## Chapin, Douglas H

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**From:** Charles Carlisle [charles.carlisle@verizon.net]  
**Sent:** Thursday, August 26, 2004 10:12 AM  
**To:** Chapin, Douglas H  
**Cc:** Alan Waltar; Ron Omberg; Bruce Klos; Al Farabee; Woody Cunningham  
**Subject:** Disposition of FFTF

Doug:

The Department of Energy has recently issued a Notice of Intent to Prepare an Environmental Impact Statement for the decommissioning of the Fast Flux Test Facility, which invites public comments or suggestions.

The attached proposal is submitted in accordance with the NOI.

This proposal, if accepted, offers the advantages of:

- A cost savings of several hundreds of millions of dollars in dismantling effort, and,

- Fulfillment of a real need to preserve fast reactor technology information and data.

If you find that the proposal has merit, will you please support its consideration in the Department's review process.

Chuck Carlisle

10/13/2004

## **THE FAST FLUX TEST FACILITY (FFTF)**

### **A PROPOSAL**

It is proposed that pending consideration pertaining to the final disposition of FFTF include the following described alternative.

#### Current Actions

Removal of the remaining nuclear fuel and liquid metal coolant (sodium) from the facility is in progress, along with other deactivation measures. When the deactivation is complete any remaining significant radioactivity will be confined to the Interim Examination Cell (IEM) and the reactor vessel. The remainder of the facility and its surroundings will be clean and amenable to unrestricted access.

#### Alternatives Now Being Considered for Final Disposition

Included are:

- Removal of all above grade structures, leaving the below grade structure, including the reactor vessel and IEM Cell, in place and weather capped. The cost, beyond the cost of completing the current actions described above, has been estimated at \$213M.\*
- Complete removal and/or reduction to rubble of the facility. The cost, beyond the cost of completing the current actions described above, has been estimated at \$596M.\*\*

\* Included in a Fluor Hanford rebaseline estimate submitted to DOE-RL on June 30, 2003

\*\*From an Accelerated Closure Team report completed on February 28, 2002



## Discussion

### FFTF

The FFTF was designed, built and operated very successfully as a fuels and materials test reactor as a part of the U.S. fast reactor development program. With the national decision to terminate that development program (and not to close the nuclear fuel cycle with its promise of an essential unlimited source of energy because of non-proliferation concerns) the primary purpose for FFTF ceased to exist. Notably, however, the facility and its operating record represented the advanced state of that technology, and were acclaimed both nationally and internationally.

### Fast Reactor Technology

The decision not to pursue, at present, further development of fast reactor technology, based on both non-proliferation and economic considerations, has been taken by both the United States and by most of the foreign countries who had such programs underway (Notably France, the United Kingdom, Germany, Japan and Russia). One consequence of that decision is that, absent remedial action, the technology information which has cost many billions of dollars to develop will, over time, be lost. Future generations, who almost certainly will have need of the energy which can be made available only by the use of fast reactors, will have to relearn all that which has been lost. Keeping available the information developed thus far in fast reactor technology may also prove to be an important and cost-effective assist in the future development of nuclear energy for space travel.

In recognition of that prospective loss the International Atomic Energy Agency (IAEA) has for the past two years had an effort underway to persuade the member nations to take steps to collect and preserve previously developed fast reactor information and data. One of the IAEA proposals is that each nation having fast reactor technology development information establish an information center, wherein information and data would be collected and preserved for future reference. Cross communications between the centers would serve to enhance their capability to ensure complete and continued availability of information.

There has not yet been U.S. action taken to implement the IAEA proposal to establish a fast reactor technology information center. The residual information (i.e., reactor and fuel design and engineering information, operating histories and experience, test data and evaluation, etc.) exists in a number of places in "dead" files, which will eventually, in the absence of preservative measures, be lost and destroyed as the engineers and technicians having the related fast reactor knowledge and experience retire and are no longer available to provide continuity.

### Alternative

Considering the above, it is proposed that, in deciding the final disposition of FFTF, the following alternative be considered:

- When the current actions to deactivate and stabilize the FFTF reactor plant are complete, retain it in that configuration.
- Utilize the deactivated plant as a combination artifact and national library for the collection and preservation of fast reactor technology information as recommended by the IAEA.
- When compatible with its service as a fast reactor technology preservation center, make the FFTF plant available for public viewing, as a museum within the Hanford Reach National Monument
- Assign custodial and management responsibility for the deactivated facility to Pacific Northwest National Laboratory (PNNL) and Argonne National Laboratory (ANL) as a joint undertaking to utilize their extensive background experience and information in the field of fast reactor technology, and to develop and maintain at FFTF a national fast reactor technology information center.

### Considerations

The estimates indicate that adapting this proposal will result in near term savings to the Government of about \$213M over the cost of disassembly to ground level, and about \$596M over the cost of complete disassembly and removal, and it will not add to any longer term cost legacy.

When all fuel and sodium have been removed from the facility, further disassembly will not provide significant further risk reduction.

When the plant is deactivated and stabilized as proposed, it is estimated that a staff of about ten employees and an annual budget of about \$5M will be required to provide custodial, janitorial and minor maintenance services for the facility, and to establish and maintain a fast reactor technology center. This will include the cost of maintaining electrical power, heat and ventilation, water and waste disposal services. The cost would not be appreciably more than that required for surveillance and maintenance of the deactivated facility.

The physical location of FFTF is such that it can be made readily accessible for both a national fast reactor technology information center and for museum purposes, once deactivation is complete.

Retaining this "state of the art" facility in tact and available for viewing will contribute significantly to the preservation of fast reactor technology information. When the FFTF plant is deactivated there will be adequate space available within the plant to provide for assembly, protection and access to a technical library and related artifacts. (If found to be practical, considerable realism could be added by moving the electronic logic components of the existing reactor operations simulator into the plant control room and displaying simulated plant operations on the existing control room panels).

There is precedence for retaining the facility as an artifact set by the retention of Experimental Breeder Reactor I (EBRI) as a Registered National Historic Landmark at the Idaho National Laboratory, and it is complimentary to current proposals to retain the B Reactor and other artifacts of the Manhattan Project as a part of the Hanford Reach National Monument. (FFTF has been nominated as an American Nuclear Society Historical Nuclear Landmark)

Submitted by:

Charles S. Carlisle  
2348 Harris Avenue  
Richland, WA 99354

August, 2004





## Chapin, Douglas H

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**From:** Beach, Robert R (Bob)  
**Sent:** Monday, August 30, 2004 7:59 AM  
**To:** Chapin, Douglas H; York, Michael T; Burton, B F Jr (Ben)  
**Cc:** Farabee, Oliver A (Al); Klos, David B (Bruce); Marshall, Wayne L; Dautel, William A; Cornwell, Bruce C  
**Subject:** Comparison Test Reactor Site Cleanup



04-100.htm (14 KB)

This press release indicates that the "Pathfinder" reactor site will be recovered to an unrestricted condition. Why is this not the condition for FFTF decommissioning?

Robert R. Beach


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# NRC NEWS

## U.S. NUCLEAR REGULATORY COMMISSION

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No. 04-100

August 30, 2004

### NRC TO MEET WITH LOCAL RESIDENTS TUESDAY IN SIOUX FALLS TO DISCUSS FINAL CLEANUP OF FORMER NUCLEAR REACTOR SITE

NRC officials will meet with local residents Tuesday in Sioux Falls, S.D., to discuss plans for the final cleanup of the former Pathfinder nuclear reactor site and potential release of the site for unrestricted use. Xcel Energy will provide an overview of its proposed decommissioning activities and schedule for Pathfinder, and NRC will discuss how it will review those plans and oversee the cleanup, and answer questions from the public.

"NRC takes very seriously its responsibility to protect the health and safety of those who live near or work at nuclear facilities," said Chad J. Glenn, NRC Project Manager. "This is the final stage in our process of overseeing Pathfinder, and we will make sure the site meets our decommissioning criteria and is safe before we terminate the license."

The meeting will be held at the County Commission Meeting Room, 2nd floor of the County Administration Building, 415 N. Dakota Avenue, from 7 to 9 p.m. NRC staff, as well as representatives of Xcel Energy, will be available to discuss the project and answer questions.

Northern States Power (now Xcel Energy), obtained an operating license from the Atomic Energy Commission (predecessor to the NRC) for the 66 megawatt facility in 1964. It conducted low-power testing from March 1964 to September 1967, after which the company shut it down for economic and other reasons. The nuclear fuel was transferred offsite, and the operating license was terminated. The plant then went into long-term storage, and a license for possession of nuclear material, which is still in effect, was issued in August 1972. In 1992, the license was amended to allow for decommissioning of the reactor building and fuel handling building. Xcel Energy now plans to complete decommissioning of the site so that, if NRC approves, it can be released for unrestricted use.

NRC actions to ensure protection of the public will include inspections and confirmatory radiation surveys to provide confidence that the site meets NRC's strict decommissioning criteria.

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*Last revised Monday, August 30, 2004*





**Chapin, Douglas H**

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**From:** Robert R. Beach [r.r.beach@verizon.net]  
**Sent:** Wednesday, September 22, 2004 5:42 PM  
**To:** Doug Chapin  
**Subject:** RR Beach Comments for EIS Scoping

Doug,  
Attached are my comments.

Bob

10/13/2004

## **COMMENTS FOR THE PUBLIC SCOPING MEETING ON THE FFTF DECOMMISSIONING EIS**

R.R. BEACH

SEPTEMBER 22, 2004

I am Robert R. Beach and reside at 7803 West Deschutes Ave. Apt. S175, Kennewick, WA, 99336.

I request that the Department of Energy sincerely consider the following comments in scoping the EIS on the proposed decommissioning of the Fast Flux Test Facility.

Although I continue to believe that the DOE could and should have served the better needs of the general public by restarting the FFTF as an activity integrating several program needs, this has proven to be impossible with the present organization of the DOE. The FFTF could have provided several programmatic needs in parallel operations, but this is counter to the individual project funding and management within DOE:

- Maintenance of DOE technology related to fast reactors
- Ex-weapons Pu burn activities
- Pu 238 production
- Tritium production
- Medical isotope production
- Research into transmutation of wastes
- Advanced fuel cycle research.

Some of these needs are now going by the wayside; others are being purchased from outside of the USA, funding work in other countries and removing jobs (and knowledge and experience) from the USA economy. Neither of these outcomes is reasonable for the betterment of the country.

Since the FFTF is to be decommissioned, please consider the following:

1. The DOE should complete this mission in compliance with, as a minimum, the same directives to which a commercial reactor would currently be decommissioned in the State of Washington. The DOE should be held to higher standards than the commercial world.

The EIS should assure that the alternative chosen meets or exceeds these requirements.

2. The cleanup of the FFTF site should not result in leaving behind a "new" waste site for the State and the general public.

The Entombment alternative appears to only create another waste site on the periphery of the Hanford site to the ultimate detriment of the general public. This may be "safe" from an environmental impact, but so would placing the waste site

in downtown Richland. The area impacted by the DOE should be contracted, not expanded by this decommissioning activity. The central plateau is the designated waste site for Hanford.

3. The evaluation of the alternatives should include the long-term cost impacts.

Risk management within the DOE should identify where funding should be used. If the risks to wait for FFTF decommissioning are minimal and other projects are of a far more serious nature, then the "No Action" alternative should be taken so that a full cleanup can be accomplished at a later date. The cleanup should not be constrained to an entombment state simply because the immediate costs are lower. The long-term surveillance costs and probable eventual removal costs should be considered.

4. Several of the included processes, e.g. bulk sodium disposition, fuel disposition, sodium-bonded fuel disposition, depleted uranium disposition, lead disposition and others, have alternative processes that should be reviewed and evaluated. Some of these are either evaluated, or partially evaluated in other NEPA documents. The environmental effects of each process considered should be defined and evaluated.

For example, the bulk sodium is currently postulated to be processed to sodium hydroxide at ANL-West for return to ORP for use. Alternatively, for cost reasons, the new contractor for the FFTF Closure may have already proposed to process the sodium in temporary equipment on the Hanford site. If this process is to be used, the local environmental impacts and accidents should be evaluated in this EIS, or the process not allowed. If the alternative for processing to waste, instead of for use within ORP, is possible, then the environmental impact of that decision should be evaluated within this EIS for information of the public as to why one decision was made. This program should not be like the car dealer that uses the "bait and switch" technique.

Thank you for this opportunity to provide my input to your decisions. I believe that the decommissioning should be run as a demonstration of how good the DOE can perform, not as a usual, low-cost alternative of minimal scope to barely meet requirements. After all, when you make the decision to throw \$1 B away, is the additional cost to do the job right of consequence?



## Chapin, Douglas H

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**From:** phale@3-cities.com  
**Sent:** Thursday, September 23, 2004 5:23 PM  
**To:** douglas\_h\_chapin@rl.gov  
**Subject:** FFTF Comment

Mr. Chapin:

I don't know that much about the workings of Hanford or DOE as I've only lived in this area for about 6 years and I don't work at Hanford.

However, I was of the understanding that the DOE issued a RFP for the decommissioning contract; some bidders have presented their bids.

My question is:

How can any company prepare and submit a bid for this FFTF project if the method(s) is/are not known? Doesn't a company need to know the full extent of the scope of work to accurately prepare a cost estimate? Please enlighten me.

Respectfully,

Paul Hale  
2917 W. 19th Ave, #33  
Kennewick, WA 99337



## Chapin, Douglas H

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**From:** Tom and Joyce Burke [tandjburke@bentonrea.com]

**Sent:** Sunday, September 26, 2004 8:10 PM

**To:** Douglas\_H\_Chapin@rl.gov

**Subject:** Comments on Proposed Scope of FFTF EIS

**COMMENTS ON THE NOTICE OF INTENT  
TO PREPARE AN ENVIRONMENTAL IMPACT STATEMENT  
FOR THE DECOMMISSIONING OF THE FAST FLUX TEST FACILITY**

My name is Tom Burke. I live in Prosser Washington. I have comments on two of the decommissioning alternatives proposed for consideration in the EIS:

First, the No Action Alternative: I understand that DOE must include the No Action Alternative for use as a basis for comparing the impacts of the other action alternatives. However, I certainly hope that DOE does not consider this to be a reasonable or viable decommissioning option. Under this alternative, more than 3,600 gallons of radioactive elemental sodium would be retained within the FFTF systems. This is clearly unacceptable from a final disposition standpoint since the sodium can and will react violently with water, potentially leading to personnel injuries and the release of radioactive material from the facility. Even in the case when there is no liquid water intrusion, the sodium will react with moisture in the air, generating hydrogen and caustic sodium hydroxide, again leading to the potential for system damage, injuries and the release of material. Although the current Environmental Assessment describes the establishment of an inert gas blanket over the sodium residuals, this clearly does not represent an acceptable final condition for facility decommissioning. Furthermore, experience at several other facilities around the world has shown that delays in removing the residual sodium often results in significant problems at a later date. These problems are the result of both loss of personnel who are knowledgeable of the systems and sodium hazards, and the degradation of the systems containing the sodium.

Secondly, the Removal Alternative: I agree that the removal alternative should be considered as one of the options. However, since the alternative described in the NOI is not complete removal (i.e., "greenfield"), I do not understand why removal of the major components of the primary system would be considered. I do understand why removal of the reactor vessel would be considered (it contains a significant inventory of long-lived radioactive isotopes due to activation of the steel). However, the other primary system components such as pumps, heat exchangers, piping and valves are not activated and will contain little or no contamination following cleaning of the residual sodium. Removal of these components from the containment building will significantly increase both the cost and risk of worker injury during decommissioning without any significant benefit. I urge DOE to redefine the removal alternative accordingly or to include an additional alternative to remove the reactor vessel but leave these other components in place.

Finally, although I know restart is not an alternative to be considered in this EIS, I would like to thank and applaud those who have worked so hard to save the FFTF.

Thank you,

*Tom Burke*

22717 S. 1545 PRSW  
Prosser, WA  
99350





## Chapin, Douglas H

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**From:** Jeremy Maxand [sra@snakeriveralliance.org]  
**Sent:** Friday, October 01, 2004 10:21 AM  
**To:** douglas\_h\_chapin@rl.gov  
**Subject:** FFTF Scoping Comments

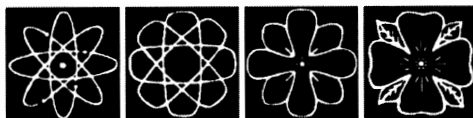


FFTF Scoping  
Comments Oct 1 20.

Mr. Chapin,

Please find attached public comments by the Snake River Alliance on the FFTF Decommissioning Environmental Impact Statement. If you need this document in a different version or have questions, please email or call. Thanks!

Jeremy M. Maxand  
Executive Director  
Snake River Alliance  
104 S Capitol Blvd  
Boise, Idaho 83702  
(208) 344-9161 voice  
(208) 331-0885 fax  
sra@snakeriveralliance.org  
snakeriveralliance.org



# snake river alliance

IDAHO'S NUCLEAR WATCHDOG

October 1, 2004

Mr. Douglas H. Chapin  
NEPA Document Manager  
FFTF Decommissioning EIS  
US Department of Energy  
PO Box 550 MS: A3-04  
Richland, WA 99352-0550

**Re: Public Scoping for the Fast Flux Test Facility Decommissioning Environmental Impact Statement**

The Snake River Alliance is an Idaho-based grassroots group working through research, education, and community advocacy for peace and justice, the end to nuclear weapons production activities, and responsible solutions to nuclear waste and contamination. My comments this evening are on behalf of our board of directors and dues-paying members.

We laud the decommissioning of the Fast Flux Test Facility but question the necessity for some envisaged steps. We have limited our recommendations for the scope of the FFTF decommissioning draft EIS to concerns about the plan's "Idaho alternative."

The draft EIS should include a thorough discussion of the need for each and every step in the decommissioning process and a very thorough comparison of the impacts of each stage occurring at Hanford versus ANL-W.

There must be a complete analysis of the relative risks and benefits of treating the radioactive sodium at both sites versus not attempting to treat and reuse it. This analysis should include a thorough cost comparison.

There must be a complete analysis of the transportation risks, particularly of the transport to Hanford of radioactive liquid sodium hydroxide. There should be a thorough survey of current shipments of radioactive liquids. There should be a complete discussion of shipping container integrity. The transportation analysis should include consideration of accidents on bridges. As the NEPA process goes forward, we urge the DOE to carry out aggressive outreach to communities all along the transportation route.

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(208) 234-4782 voice  
(208) 232-4922 fax

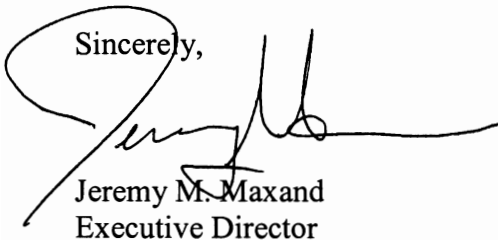
There should be a thorough discussion of the need for treatment of the sodium-bonded fuel from the FFTF. There has never been a convincing case for the unavoidability of treating sodium-bonded fuel before disposition. The discussion must make that case. It must explain why pyroprocessing is going forward on any sodium-bonded fuel before acceptance criteria for a HLW and spent fuel repository have been developed. This discussion should include information, including cost, on activities that proceeded to prepare waste for the Waste Isolation Pilot Plant that ultimately proved useless once WIPP's WACs were finalized. The urgency of the need for this discussion is highlighted by the fact that the waste streams produced by pyroprocessing are not in the current license application for Yucca Mountain. The proliferation analysis of pyroprocessing should be repeated in light of concern about terrorism and "dirty bombs."

What is the projected operating life of ANL-W's Fuel Conditioning Facility with and without the addition of FFTF spent fuel?

Analysis of the plan to clean FFTF system components should include a discussion of impediments to eventual direct disposal. It is unwise for the DOE to prepare this draft EIS simultaneously with an EA on the Remote Treatment Project, which has yet to be approved.

If you have questions, please feel free to contact me in our Boise office.

Sincerely,



Jeremy M. Maxand  
Executive Director

104 S Capitol Blvd  
PO Box 1731  
Boise, Idaho 83701  
(208) 344-9161 voice  
(208) 344-9161 fax

411 E 6<sup>th</sup> Street/ERC  
PO Box 4090  
Ketchum, Idaho 83340  
(208) 726-7271 voice

310 E Center Street  
Pocatello, Idaho 83201  
(208) 234-4782 voice  
(208) 232-4922 fax



**Chapin, Douglas H**

---

**From:** Jcbolliger@aol.com  
**Sent:** Sunday, October 03, 2004 10:58 AM  
**To:** Douglas\_H\_Chapin@rl.gov  
**Subject:** Comment re: FFTF Endstate

Dear Mr. Chapin:

I don't want a pile of junk left in the Tri Cities' back yard. Thus, neither Entombment nor Brownfield should be the selected end state for the FFTF. Rather, my first choice is Greenfield. My second choice is No Action.

Respectfully submitted,

John C. Bolliger  
Tri Cities lifelong resident

10/13/2004



**Chapin, Douglas H**

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**From:** KDDNEP@aol.com  
**Sent:** Friday, October 08, 2004 10:42 AM  
**To:** Douglas\_H\_Chapin@rl.gov  
**Subject:** FFTF Decommissioning EIS Scoping Comments

Dear Mr. Chapin:

Moments ago, I placed the following letter in the US Mail. I am submitting this advance copy by email to document that I have met the submittal date, in case the post mark on the mailed copy is not today. I am also including a Word Document file in case you need that. Note that the Secretary Thompson attachment is not included in this electronic submittal because I currently do not have scan capability here at home. It is in the US Mail transmittal.

If it would be helpful for me to supply a copy of any of the five references, please contact me and I will be happy to provide you one.

Thanks,

Ken Dobbin, councilman  
5303 Blue Heron  
West Richland, WA, 99353

October 7, 2004

Mr. Doug Chapin, NEPA Document Manager  
US Department of Energy, Richland Operations Office  
P. O. Box 550, Mail Stop A3-04  
Richland, Washington 99352

Subject: FFTF Decommissioning EIS Scoping Comments

Dear Mr. Chapin:

As I announced at the September 22, 2004, public meeting in Richland, this letter formally transmits my comments on the scope of the National Environmental Policy Act (NEPA) Environmental Impact Statement required for FFTF decommissioning. At that meeting, the United States Department of Energy (US DOE) stated that the selection of the three alternatives was based upon a Record of Decision (ROD) drawn from the Programmatic Environmental Impact Statement (PEIS) of Reference 1. Federal law requires the PEIS to be supplemented prior to acting on any of the alternatives presented at the September 22 meeting, as explained below. Code of Federal Regulations, Title 10, Part 1021, Section 314 states: "DOE shall prepare a supplemental EIS if there are substantial changes to the proposal or significant new circumstances or information relevant to environmental concerns..."

Since the PEIS was written in December 2000, there have been significant new circumstances relevant to environmental concerns that have come to light. Therefore the US DOE is required to prepare a supplemental EIS. Five US DOE reports and a letter from the Secretary of Health and

10/13/2004



Human Services, Tommy Thompson, emphatically state America's need for a fast neutron spectrum reactor. Significant degradation of the America's environment in the search for more fossil fuels and a decline in Americans' health and well-being will occur if these reports and letter are not evaluated in a supplemental EIS. Without this further evaluation, an environment-saving, life-saving facility will be illegally destroyed.

The significant US DOE reports are listed as References 2 through 6. Reference 2 is a review by the US DOE Brookhaven Area Office recommending a public-private cooperative effort to use the FFTF for our national energy and medical needs. Reference 3 is a roadmap for America's energy future that states the need for a fast reactor for development of the next generation of safe, environmentally friendly nuclear power plants. Reference 4 is a US DOE report to Congress that states the need of a fast reactor to develop recycle of spent nuclear fuel and reduction of waste. In Reference 5, the US DOE Inspector General reports a national security issue from radioisotope shortages. Reference 6 is emphatic that a fast test reactor is needed to implement the next generation of safe reactors. The FFTF is America's only fast reactor and has the capability to do all those missions simultaneously. The supplemental EIS must evaluate the FFTF capability in light of these five reports and compare against the alternative of the enormous expense and environmental degradation of rebuilding another FFTF to perform the required tasks.

In addition, a letter (attached) dated October 8, 2002, from the Secretary of Health and Human Services, Tommy Thompson, to the Secretary of the Department of Energy, Spencer Abraham, predicts future shortages of medical isotopes without the FFTF. That letter was written in response to a community proposal for a private-public partnership to use the FFTF for energy development and radioisotope production. Secretary Thompson wrote: "but given that one of the intentions is to increase the supply of radioisotopes for medical treatment and reduce the nation's dependence on foreign sources, I ask you to give the proposal every consideration." The NEPA law requires that human factors be included in the EIS. Loss of American life as a result of radioisotope shortages from not operating the FFTF must be evaluated in the supplemental EIS. The Secretary Thompson letter is new information after the PEIS was published.

Another new development occurring after the PEIS is the decision to decommission the Plutonium Finishing Plant (PFP) where the non-irradiated FFTF fuel is stored. The 1995 FFTF Environmental Assessment only evaluated the transport and storage of the FFTF fuel at the PFP, not the transport and storage to other locations after the PFP is decommissioned. The supplemental EIS must include the evaluation of the disposition of that fuel after the PFP is "slab on grade" in 2009. The best alternative is to burn the FFTF fuel stored at the PFP to a "spent fuel standard" before the FFTF is decommissioned. Other options require constant vigilance to guard the fuel so that it does not fall into the wrong hands. Use of that fuel for other than reactor purposes would do tremendous damage to the environment. No other reactor in the United States can burn fuel of that enrichment. Therefore, the supplemental EIS must evaluate an alternative that will burn this fuel prior to any further degradation of FFTF systems and components and this EIS must be completed before a decommissioning alternative is selected.

Because any further destruction of the FFTF prior to completing the supplemental EIS will predetermine the outcome, I request that all further activities that will cause harm to systems and components be stopped. A federal court ruling strengthens this demand for not predetermining the outcome of the NEPA process. On February 28, 2003, United States District Court Judge Edward Shea ruled regarding the FFTF: "Prior to committing any resources to any one of the options for decommissioning, the DOE must prepare an EIS. 40 C.F.R 1502.2(f). This ensures the opportunity for public input." (Reference 7)

I respectfully submit these comments on behalf of the citizens of West Richland who have asked me to represent them. The FFTF is located only 10 air-miles north of our city and our citizens demand a voice in determining the environmental impacts of the disposition of this facility. Any further action without their input is not acceptable. The NEPA process must allow them to speak to the issues presented above.

Sincerely,

Ken Dobbin, councilman  
5303 Blue Heron  
West Richland, WA 99353

#### References:

- 1) Final Programmatic Environmental Impact Statement for Accomplishing Expanded Civilian Nuclear Energy Research and Development and Isotope Production Missions in the United States, Including the Role of the Fast Flux Test Facility, DOE/EIS-0310, December 2000.
- 2) Report on the Review of the Decision to Permanently Deactivate the Fast Flux Test Facility, July 2001, transmitted by letter from Michael D. Holland, Department of Energy, Brookhaven Area Office, September 2001.
- 3) Technology Roadmap for Generation IV Nuclear Energy Systems, GIF-002-00, 03-GA50034, US DOE Nuclear Energy Research Advisory Committee and the Generation IV International Forum, December 2002.
- 4) Report to Congress on Advanced Fuel Cycle Initiative: The Future Path for Advanced Spent Fuel Treatment and Transmutation Research, US DOE Office of Nuclear Energy, Science, and Technology, January 2003.
- 5) Audit Report: Plutonium-238 Production, DOE/IG-0607, US DOE Office of Inspector General, Office of Audit Services, June 2003.
- 6) The U.S. Generation IV Implementation Strategy, 03-GA50439-06, US DOE Office of Nuclear Energy, Science, and Technology, September 2003.
- 7) United States District Court, Eastern District of Washington, Benton County v. US Department of Energy, No. CT-02-5100-EFS, February 28, 2003.

#### Attachment:

Letter, Tommy G. Thompson, Secretary of Health and Human Services, to Spencer Abraham, Secretary of the Department of Energy, October 8, 2002.

October 7, 2004

Mr. Doug Chapin, NEPA Document Manager  
US Department of Energy, Richland Operations Office  
P. O. Box 550, Mail Stop A3-04  
Richland, Washington 99352

Subject: FFTF Decommissioning EIS Scoping Comments

Dear Mr. Chapin:

As I announced at the September 22, 2004, public meeting in Richland, this letter formally transmits my comments on the scope of the National Environmental Policy Act (NEPA) Environmental Impact Statement required for FFTF decommissioning. At that meeting, the United States Department of Energy (US DOE) stated that the selection of the three alternatives was based upon a Record of Decision (ROD) drawn from the Programmatic Environmental Impact Statement (PEIS) of Reference 1. Federal law requires the PEIS to be supplemented prior to acting on any of the alternatives presented at the September 22 meeting, as explained below. Code of Federal Regulations, Title 10, Part 1021, Section 314 states: "DOE shall prepare a supplemental EIS if there are substantial changes to the proposal or significant new circumstances or information relevant to environmental concerns..."

Since the PEIS was written in December 2000, there have been significant new circumstances relevant to environmental concerns that have come to light. Therefore the US DOE is required to prepare a supplemental EIS. Five US DOE reports and a letter from the Secretary of Health and Human Services, Tommy Thompson, emphatically state America's need for a fast neutron spectrum reactor. Significant degradation of the America's environment in the search for more fossil fuels and a decline in Americans' health and well-being will occur if these reports and letter are not evaluated in a supplemental EIS. Without this further evaluation, an environment-saving, life-saving facility will be illegally destroyed.

The significant US DOE reports are listed as References 2 through 6. Reference 2 is a review by the US DOE Brookhaven Area Office recommending a public-private cooperative effort to use the FFTF for our national energy and medical needs. Reference 3 is a roadmap for America's energy future that states the need for a fast reactor for development of the next generation of safe, environmentally friendly nuclear power plants. Reference 4 is a US DOE report to Congress that states the need of a fast reactor to develop recycle of spent nuclear fuel and reduction of waste. In Reference 5, the US DOE Inspector General reports a national security issue from radioisotope shortages. Reference 6 is emphatic that a fast test reactor is needed to implement the next generation of safe reactors. The FFTF is America's only fast reactor and has the capability to do all those missions simultaneously. The supplemental EIS must evaluate the FFTF capability in light of these five reports and compare against the alternative of the enormous expense and environmental degradation of rebuilding another FFTF to perform the required tasks.

In addition, a letter (attached) dated October 8, 2002, from the Secretary of Health and Human Services, Tommy Thompson, to the Secretary of the Department of Energy, Spencer Abraham, predicts future shortages of medical isotopes without the FFTF. That letter was written in response to a community proposal for a private-public partnership to use the FFTF for energy development and radioisotope production. Secretary Thompson wrote: "but given that one of the intentions is to increase the supply of radioisotopes for medical treatment and reduce the nation's dependence on foreign sources, I ask you to give the proposal every consideration." The NEPA law requires that human factors be included in the EIS. Loss of American life as a result of radioisotope shortages from not operating the FFTF must be evaluated in the supplemental EIS. The Secretary Thompson letter is new information after the PEIS was published.

Another new development occurring after the PEIS is the decision to decommission the Plutonium Finishing Plant (PFP) where the non-irradiated FFTF fuel is stored. The 1995 FFTF Environmental Assessment only evaluated the transport and storage of the FFTF fuel at the PFP, not the transport and storage to other locations after the PFP is decommissioned. The supplemental EIS must include the evaluation of the disposition of that fuel after the PFP is "slab on grade" in 2009. The best alternative is to burn the FFTF fuel stored at the PFP to a "spent fuel standard" before the FFTF is decommissioned. Other options require constant vigilance to guard the fuel so that it does not fall into the wrong hands. Use of that fuel for other than reactor purposes would do tremendous damage to the environment. No other reactor in the United States can burn fuel of that enrichment. Therefore, the supplemental EIS must evaluate an alternative that will burn this fuel prior to any further degradation of FFTF systems and components and this EIS must be completed before a decommissioning alternative is selected.

Because any further destruction of the FFTF prior to completing the supplemental EIS will predetermine the outcome, I request that all further activities that will cause harm to systems and components be stopped. A federal court ruling strengthens this demand for not predetermining the outcome of the NEPA process. On February 28, 2003, United States District Court Judge Edward Shea ruled regarding the FFTF: "Prior to committing any resources to any one of the options for decommissioning, the DOE must prepare an EIS. 40 C.F.R 1502.2(f). This ensures the opportunity for public input." (Reference 7)

I respectfully submit these comments on behalf of the citizens of West Richland who have asked me to represent them. The FFTF is located only 10 air-miles north of our city and our citizens demand a voice in determining the environmental impacts of the disposition of this facility. Any further action without their input is not acceptable. The NEPA process must allow them to speak to the issues presented above.

Sincerely,

Ken Dobbin, councilman  
5303 Blue Heron  
West Richland, WA 99353

#### References:

- 1) *Final Programmatic Environmental Impact Statement for Accomplishing Expanded Civilian Nuclear Energy Research and Development and Isotope Production Missions in the United States, Including the Role of the Fast Flux Test Facility*, DOE/EIS-0310, December 2000.
- 2) *Report on the Review of the Decision to Permanently Deactivate the Fast Flux Test Facility*, July 2001, transmitted by letter from Michael D. Holland, Department of Energy, Brookhaven Area Office, September 2001.
- 3) *Technology Roadmap for Generation IV Nuclear Energy Systems*, GIF-002-00, 03-GA50034, US DOE Nuclear Energy Research Advisory Committee and the Generation IV International Forum, December 2002.
- 4) *Report to Congress on Advanced Fuel Cycle Initiative: The Future Path for Advanced Spent Fuel Treatment and Transmutation Research*, US DOE Office of Nuclear Energy, Science, and Technology, January 2003.
- 5) *Audit Report: Plutonium-238 Production*, DOE/IG-0607, US DOE Office of Inspector General, Office of Audit Services, June 2003.
- 6) *The U.S. Generation IV Implementation Strategy*, 03-GA50439-06, US DOE Office of Nuclear Energy, Science, and Technology, September 2003.
- 7) *United States District Court, Eastern District of Washington, Benton County v. US Department of Energy*, No. CT-02-5100-EFS, February 28, 2003.

#### Attachment:

Letter, Tommy G. Thompson, Secretary of Health and Human Services, to Spencer Abraham, Secretary of the Department of Energy, October 8, 2002.



## Chapin, Douglas H

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**From:** Brian & Marlene Oliver [bmoliver@televar.com]  
**Sent:** Friday, October 08, 2004 4:00 PM  
**To:** Chapin, Doug  
**Subject:** Public comment FFTF scoping and decommissioning

Comment to Doug Chapin NEPA document manager, FFTF decommissioning EIS.

I cannot believe that the DOE has let a contract to create a high-level nuclear waste site at Hanford 400 area where no contamination now exists. Also, incredibly, occurred prior to ANY NEPA review or public comment opportunity.

I firmly believe that FFTF restart is desperately needed for the production of life-giving medical isotopes, and including Pu-238.

NERAC says that the decision to close close FFTF is to be regretted.

Federal laws have obviously been broken in this process.

NO ACTION recommended AND, INCLUDING maintenance of the FFTF as a recoverable reactor.

Thank you,

Marlene Oliver  
94006 Northstar Lane PR NE  
West Richland WA 99353  
509-967-9000





## Chapin, Douglas H

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**From:** Roger Turner [rturner@shoshonebannocktribes.com]  
**Sent:** Friday, October 08, 2004 4:33 PM  
**To:** Douglas\_H\_Chapin@rl.gov  
**Subject:** FW: FFTF Comments



FFTF Comments



fft-eis-comments10  
04.wpd (6 K...

-----Original Message-----

**From:** Roger Turner [mailto:rturner@shoshonebannocktribes.com]  
**Sent:** Friday, October 08, 2004 5:30 PM  
**To:** 'Douglas\_H\_Chaplin@doe.gov'  
**Subject:** FFTF Comments

## Chapin, Douglas H

---

**From:** Roger Turner [rturner@shoshonebannocktribes.com]  
**Sent:** Friday, October 08, 2004 4:06 PM  
**To:** Douglas\_H\_Chaplin@rl.gov  
**Subject:** FFTF Comments



fft-eis-comments10  
04.wpd (6 K...

Mr. Douglas H. Chaplin:

Please find attached comments on the Fast Flux Test Facility Decommissioning.

Thanks  
Roger Turner

October 8, 2004

Mr. Douglas H. Chaplin  
NEPA Document Manager  
FFTF Decommissioning EIS  
U.S. Department of Energy  
P.O. Box 550 MS: A3-04  
Richland, WA 99352-0550  
email: [Douglas\\_H\\_Chaplin@rl.gov](mailto:Douglas_H_Chaplin@rl.gov)

**Subject: Comments by the Shoshone-Bannock Tribes' Air Quality Department on the FFTF Decommissioning EIS**

Mr. Douglas H. Chaplin:

The Shoshone-Bannock Tribes appreciate the opportunity to comment on the scoping for the Fast Flux Facility Decommissioning (FFTF).

The DOE proposed that in all but the "No Action" alternatives, radioactive waste would be transported through the Fort Hall Reservation, homeland to the Shoshone-Bannock Tribes (hereafter "Tribes"). The Tribes are very concerned in any alternatives that result in the transport of highly radioactive material through the Fort Hall Reservation. Furthermore the DOE is increasing the risks to the environment, by preliminarily selecting a limited set of alternatives, at the INEEL; the aboriginal lands of the Tribes, by the proposed treatment and storage of the FFTF decommissioned/deactivated material, when treatment and storage of these materials could be accomplished at the Hanford site.

The FFTF used sodium rather than water to cool the reactor. Sodium burns when exposed to air and explodes upon contact with water. Because of the increased risk associated with the transportation of radioactive sodium and sodium filter material, the DOE needs to include in the final EIS alternatives that provide that the material from the FFTF deactivation and decommissioning be treated and stored on-site.

The DOE should also include as an alternative evaluation the possibility that the Yucca Mountain, or other designated High-Level waste repository, may not be open to accept high-level waste from the INEEL that originated from the FFTF.. The Tribes oppose long-term storage of high-level waste at the INEEL because over time, the INEEL is becoming a *de facto* high-level storage facility.

To avoid this possibility all FFTF alternatives that potentially create high-level waste should include appropriate selection and scoping of alternatives for the return of these materials to Hanford, or to avoid the transport of them for treatment at the INEEL, in the first place. The alternatives should include a cost analyses associated with the possibility that wastes generated at the INEEL from treatment of the FFTF material, may not be accepted at Yucca Mountain, or at the WIPP site, as scheduled presently by DOE.

The Shoshone-bannock Tribes appreciate this opportunity to comment on the FFTF EIS scoping.

Sincerely yours,

Roger Turner



## Chapin, Douglas H

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**From:** Carl Holder [holdercarl@hotmail.com]  
**Sent:** Sunday, October 10, 2004 8:55 PM  
**To:** douglas\_h\_chapin@rl.gov  
**Subject:** eis letter oops

Doug,  
the first transmittal of my eis comment had an oops.  
Please delete from the record. I have re-sent the same to you with  
correction.  
Carl Holder

## Chapin, Douglas H

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**From:** Carl Holder [holdercarl@hotmail.com]  
**Sent:** Sunday, October 10, 2004 8:53 PM  
**To:** douglas\_h\_chapin@rl.gov  
**Subject:** FFTF Scoping

October 8, 2004

Mr. Douglas Chapin  
NEPA Document Manager  
US Department of Energy  
PO Box 550 ms A3-04  
Richland WA 99352

RE: Input on Public Scoping - EIS for Decommissioning of the FFTF.

1. UNDER THE NO ACTION ALTERNATIVE THE FACILITY MUST BE MAINTAINED AS RECOVERABLE AT LEAST UNTIL ISSUANCE OF THE RECORD OF DECISION.
2. THE NATION'S VITAL INTEREST CAN ONLY BE PROTECTED IF THE EIS CONTAINS AN ALTERNATIVE THAT CONSIDERS THE FUTURE BENEFICIAL USES OF THE FFTF.
3. GREENFIELD IS THE ONLY ACCEPTABLE DECOMMISSION ENDSTATE.

As in my presentation at the Richland Public Meeting, I spoke to the Timing and Analysis of Alternatives of the NEPA process. The Timing appears to be over two years late and thus due to the physical degradation of the FFTF facility, the Alternatives may NOW be constrained to the proposed destructive actions. This violates the letter and intent of the National Environmental Protection Act.

It is undisputed that NEPA analysis of decommissioning has not been accomplished. But, it has become obvious that DOE directed a closure project for decommission, entombment endstate, via CERCLA process. When was the decision made to decommission, who made the decision to decommission, and whose environmental compliance signature accompanied that decision? \*\*\*

The 1995 Environmental Assessment (95EA) and Finding of No Significant Impact (FONSI) defines the current legal status of the FFTF, today. Deactivation ending in long term Surveillance and Maintenance is the current regulatory plan. This deactivated, "lights out," endstate is engrained into TPA milestones after numerous, well attended public hearings.

It is important to note that the 95EA/FONSI Permanent Deactivation has been suspended numerous times.

On October 5, 1998, DOE published a notice of intent to prepare a programmatic environmental impact statement (PEIS) to research using the FFTF... This draft PEIS incorporated the 1995 EA by reference, and stated that decommissioning was not addressed due to the uncertainty regarding the timing of such action and that an EIS would be completed prior to decommissioning.

January - 2001. The Record of Decision (ROD) was signed by Secretary Richardson. It included the Permanent Deactivation of the FFTF.

April 24, 2001. Secretary Abraham ordered a review of the decision.

December 14, 2001. Undersecretary Robert Card recommended "...and move ahead with facility deactivation." Secretary Abraham approved the memo the same day.

December 19, 2001. DOE HQ Press Release. "...the department will proceed with the deactivation of the facility."

December 19, 2001. "Secretary Abraham directed that actions be taken to proceed immediately with the deactivation, decontamination, and decommissioning of the fast flux reactor." (from July 15, 2002, DOE's Chief of Staff correspondence)

40CFR 1502.5 Timing. A agency shall commence preparation of an environmental impact statement as close as possible to the time the agency is developing or is presented with a proposal so that preparation can be completed in time for the final statement to be included in any recommendation or report on the proposal.

Since December 19, 2001, there have been very significant events that impact the national nuclear infrastructure. Under NEPA, there should have been a Supplemental Analysis of these very significant events. Under NEPA, these events should have been considered in a reuse/decommission Environmental Impact Statement.

In the 2000 Programmatic Environmental Impact Statement, there were three major areas of programmatic review:

1. Nuclear Energy Research and Development
2. Production of Pu-238 for the Space and other Missions
3. Medical and Commercial Isotope production

1). In the 2001 ROD, Secretary Richardson relies upon the use of Accelerators for the future development of Advanced Transmutation research. In the Bush Administration, a) Chief of Staff McSlarrow reported that the Department is moving away from accelerators due to the expense and toward reactors. b.) NERAC states that the "only option" is the restart of the FFTF, and that the loss of the FFTF "is to be regretted." c.) Major national and international reports are published such as the Advanced Fuel Cycle Initiative, and the Generation IV International Forum. d.) China embarks upon a very ambitious nuclear power and nuclear R&D program. e.) Nuclear fuel prices are increasing dramatically and the USA is dependent upon imports.

2). On June 13, 2003, USDOE IG reported on the status of PU-238 Production.

"Unless the Department accelerates its program to reestablish a plutonium-238 production capability, it risks being unable to meet future national security and NASA requirements... Continuing delays in reestablishing a domestic plutonium-238 production capability could adversely impact the Department's ability to meet its core national security mission, as well as those of the Department of Defense, NASA, and other Government users." Some question whether or not Oak Ridge has the capability, with the current nuclear infrastructure and knowledge base, feasibly accomplish this task!

3). On October 8, 2002, Secretary Tommy Thompson wrote to Secretary Abraham. "It was brought to my attention that the demand for medical isotopes may exceed the supply in the near future. As I understand it, as much as 90 percent of approved medical supplies used in the United States are produced abroad,... Thus the United States may be unduly dependent on radioisotopes produced overseas. The U.S. medical radioisotope supply depends on production that we cannot control, and we cannot assure that radioisotopes can be reliably and securely imported... I am also aware that the DOE is currently considering a proposal by the Community ReUse Agency (CRA) to redeploy the Fast Flux Test Facility... I ask you to give the proposal every consideration."

PUBLIC COMMENT. I believe that these are deficiencies in this NEPA program that may be in turn influencing the Scoping effort. This needs clarification before Scoping efforts continue.

My study and knowledge of what has been accomplished in the NEPA process is that the FFTF facility and this nationally important capability has not been adequate or legally evaluated in a timely manner. It would appear that activities to continue to "deactivate" the reactor that will compromise any



ability to "recover" the capability of this facility, pending proper scoping, direction from the alternatives of EIS, and the resulting Record of Decision would be inconsistent with the intent to preserve the availability of good and valuable alternatives. This is the heart of NEPA.

40CFR1502.14 Alternatives including the proposed action. This section is the heart of the environmental impact statement... it should present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decisionmaker and the public.

IT APPEARS THAT THE NATION'S VITAL INTEREST CAN ONLY BE PROTECTED IF THE SCOPE OF THE EIS CONTAINS AN ALTERNATIVE THAT CONSIDERS THE FUTURE BENEFICIAL USES OF THE FFTF.

There is adequate documentation from federal and international agencies and commercial entities that support such a position. For example: GENIV, AFCI, NERAC/ANTT, HHS, DOE IG, YUCCA MTN, S&P, and other documentation.

Respectfully submitted:

Carl G. Holder  
PO Box 1316  
Pasco, WA 99301